

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA, )  
                                  )  
                                  )  
Plaintiff,                   )  
                                  )  
v.                            )       No.  
                                  )  
                                  )  
NINETY THOUSAND, SIX       )  
HUNDRED DOLLARS (\$9,600.00) )  
U.S. CURRENCY,               )  
                                  )  
Defendant.                   )

**VERIFIED COMPLAINT OF FORFEITURE**

Comes now plaintiff, United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Zia M. Faruqui, Assistant United States Attorney, for said district, and in a civil cause of action for forfeiture respectfully states as follows:

1. In this *in rem* civil action the United States seeks forfeiture of certain property, currently in the possession and custody of the plaintiff pursuant to the provisions of Title 21, United States Code, Section 881.
2. Subject Matter Jurisdiction of this Court is based on Title 28, United States Code, Sections 1345, 1355(a), and Title 21, United States Code, Section 881. *In rem* jurisdiction is based on Title 28, United States Code, Section 1355. Venue is proper in this district pursuant to Title 28, United States Code, Sections 1355 & 1395 and Title 21, United States Code, Section 881(j).
3. The defendant property was furnished or intended to be furnished in exchange for controlled substances in violation of the Controlled Substances Act, Title 21, United States Code,

Section 801 *et seq.*, was proceeds traceable to such an exchange, and was used or intended to be used to facilitate such an exchange. The defendant property is therefore subject to forfeiture to the United States of America, under the provisions of Title 21, United States Code, Section 881(a)(6).

4. The defendant property was seized in the Eastern District of Missouri and is now, and during the pendency of this action will be in the jurisdiction of this court.

5. On or about April 9, 2011, the defendant currency (\$9,600.00) was seized from Larry Bell by the Drug Enforcement Administration. The plaintiff alleges the defendant property is subject to forfeiture and for its reasons states as follows:

6. An ongoing investigation conducted by the Drug Enforcement Administration identified multiple individuals involved in the distribution of cocaine in the St. Louis, MO area. During the investigation, surveillance revealed that Larry Bell was planning to purchase a large amount of cocaine from a suspected drug trafficker in St. Louis on April 9, 2011.

7. On April 9, 2011, investigators observed Larry Bell arrive at a Home Depot driving a Hyundai sedan. Investigators observed Bell open the hood as though he was having problems with the vehicle. At this time, investigators approached Bell and detained him. Agents discovered approximately \$9,600.00 U.S. Currency in his front jacket pocket.

8. Bell voluntarily stated that he was in St. Louis to pick up his nephew and that he was in possession of the U.S. Currency because he was going to possibly purchase a truck. He further stated that the currency was his, and that he had borrowed it from his two sisters. Linda Bell, one of Larry Bell's sisters, was arrested on December 10, 2010 as a part of this investigation with approximately eight ounces of cocaine.

9. The statements made by Bell contradicted the information agents previously developed in the investigation. Due to the contradictory statements and the previously gathered information about Bell's intended drug purchase scheduled for that same day, agents seized the currency and released Bell.

10. The only persons known to have any possible interests in the defendant property are Larry Bell, Linda Bell, and Sherri Bell.

11. By reason of these premises, the defendant property is subject to forfeiture to the United States, pursuant to the provisions of Title 21, United States Code, Section 881.

WHEREFORE, Plaintiff prays that a Warrant for Arrest be issued for the defendant property and the defendant property be condemned and forfeited to the United States of America, in accordance with the provisions of law; and that the plaintiff be awarded its costs in this action, and have such other relief as provided by law and the nature of the case may require.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

/s/ Zia M. Faruqui  
Zia M. Faruqui  
Assistant United States Attorney  
111 South Tenth Street, 20th Floor  
St. Louis, Missouri 63102  
(314) 539-2200

VERIFICATION

I, Special Agent Brandon Moles, hereby verify and declare under penalty of perjury that I am a Special Agent with the United States Drug Enforcement Administration, that I have read the foregoing Verified Complaint *in rem* and know the contents thereof, and that the matters contained in the Verified Complaint are true to my own knowledge, except that those matters herein stated to be alleged on information and belief and as to those matters I believe them to be true.

The sources of my knowledge and information and the grounds of my belief are the official files and records of the United States, information supplied to me by other law enforcement officers, as well as my investigation of this case, together with others, as a Special Agent of the Drug Enforcement Administration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 11-3-2011  
(date)

SA B1 Moles  
BRANDON MOLES  
Special Agent  
Drug Enforcement Administration